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09-040

GENERAL

FEIN # 20-0322835

☐ 13-403 Facilities-Based Interexchange
☒ 13-404 Resale of Local and/or Interexchange
☐ 13-405 Facilities-Based Local

[Handwritten signature]

3. Request for waivers/variances:

In applications for local exchange service authority under Sections 13-404 or 13-405, waivers of Part 710 and of Section 735.180 of Part 735 are generally requested. In applications for interexchange service authority under Sections 13-403 and 13-404, waivers of Part 710 and Part 735 are generally requested. Please indicate which waivers Applicant is requesting and explain why Applicant is requesting each waiver/variance.

- | | | |
|---|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ■ | Part 710 | Uniform System of Accounts for Telecommunications Carriers |
| ■ | Part 735 | Procedures Governing the Establishment of Credit, Billing, Deposits, Termination of Service and Issuance of Telephone directories for Local Exchange Telecommunications Carriers in the State of Illinois |
| ■ | Section 735.180 | Directories |
| ■ | Other | 83 Ill Adm. Code Part 250 (keeping administrative books in Illinois) |

Applicant seeks a waiver of Part 710 Uniform System of Accounts ("USOA") for Telecommunications Carriers because Applicant currently maintains a single set of its books and records according to the Generally Accepted Accounting Principles ("GAAP"). Accordingly, Applicant requests the waiver to avoid the burdens associated with maintaining two sets of books. USOA was designed for an older form of rate base regulation that has little value in the current telecommunications environment.

Moreover, for companies other than ILECs, GAAP is the standard accounting method - a method that provides sufficient detail for easy comparison between telecommunications companies. Applicant understands that a waiver of this requirement will not excuse it from compliance with future Commission rules or amendment of Part 710 that are otherwise applicable to the Applicant.

Applicant seeks a waiver of Part 735 with regard to issuing directories. Applicant will contract with the incumbent LEC to ensure directories are made available to its retail customers.

Applicant seeks a waiver of part 735.180 to the extent that it will contract with the underlying incumbent LEC for the provision of directory listings. Applicant understands that failing this agreement, it is responsible for the provision of directory publications.

Finally, Applicant seeks a waiver of ILL ADMIN CODE title 83 Section 250.10, which requires public utilities to keep books, accounts, records and memoranda within the State of Illinois. Applicant maintains its books and records at its offices in Florida. Should it be necessary for the Commission to have access to those books and records, Applicant will facilitate such access expeditiously and at its own expense.

4. For all applicants requesting local exchange authority under Section 13-404 or Section 13-405, please complete the following:

- (a) the Standard Questions for Applicants Seeking Local Exchange Service Authority found in Appendix A of this document
- (b) the 9-1-1 Questions for Applicants Seeking Local Exchange Service Authority found in Appendix B of this document;
- (c) the Financial Questions for Applicants Seeking Local Exchange Service Authority found in Appendix C of this document; and
- (d) if applicable, the Prepaid Service Questions for Applicants Seeking Local Exchange Service Authority found in Appendix D of this document. Not applicable.

See Appendices A-C.

5. In what area of the state does the Applicant propose to provide service?

Applicant will offer resold telecommunications services. Intrastate long distance service will be provided throughout the State of Illinois. Applicant intends to initially offer local exchange services throughout the state in exchanges currently served by AT&T and Verizon North, Inc.

6. Please attach a sheet designating contact persons to work with Staff on the following:

Please identify each contact person's (i) name, (ii) title, (iii) mailing address, (iv) telephone number, (v) facsimile number, and (vi) e-mail address.

(a) issues related to processing this application

Monique Byrnes
Consultant to WTI Communications, Inc.
Technologies Management, Inc.
2600 Maitland Center Parkway, Suite 300
Maitland, FL 32751
Phone: 407-740-3005
Fax: 407-740-0613
E-Mail: mbyrnes@tminc.com

(b) consumer issues

Rhett Collver
WTI Communications, Inc.
2670 N Main St # 320
Santa Ana, CA 92705
Phone: 888.425.8880
Fax: 888.888.0579

(c) Customer complaint resolution

Rhett Collver
WTI Communications, Inc.
2670 N Main St # 320
Santa Ana, CA 92705
Phone: 888.425.8880
Fax: 888.888.0579

6. Please attach a sheet designating contact persons to work with Staff on the following:
(Cont'd.)

(d) **technical and service quality issues**

Rhett Collver
WTI Communications, Inc.
2670 N Main St # 320
Santa Ana, CA 92705
Phone: 888.425.8880
Fax: 888.888.0579

(e) **"tariff" and pricing issues**

Tony Rodriguez
WTI Communications, Inc.
2670 N Main St # 320
Santa Ana, CA 92705
Phone: 888.425.8880
Fax: 888.888.0579

(f) **9-1-1 issues**

Tony Rodriguez
WTI Communications, Inc.
2670 N Main St # 320
Santa Ana, CA 92705
Phone: 888.425.8880
Fax: 888.888.0579

(g) **security/law enforcement**

Tony Rodriguez
WTI Communications, Inc.
2670 N Main St # 320
Santa Ana, CA 92705
Phone: 888.425.8880
Fax: 888.888.0579

7. Please check type of organization?

- | | | |
|--------------------------------------|-------------------------------------------------|------------|
| <input type="checkbox"/> Individual | <input checked="" type="checkbox"/> Corporation | |
| <input type="checkbox"/> Partnership | Date Corporation was formed: | 10/15/2003 |
| | In What State? | California |
| <input type="checkbox"/> Other – LLC | | |

8. Submit a copy of articles of incorporation and a copy of certificate of authority to transact business in Illinois.

See Exhibit I.

9. List jurisdictions in which Applicant is offering service(s).

California

10. Has the Applicant, or any principal in Applicant, been denied a Certificate of Service or had its certification revoked or suspended in any jurisdiction in this or another name?

- ☐ Yes (please provide details)
☒ No

11. Have there been any complaints or judgements levied against the Applicant in any other jurisdiction?

- ☒ Yes (please provide details) Please See Exhibit II
☐ No

12. Has Applicant provided service under any other name?

- ☐ Yes (please provide list)
☒ No

13. Will the Applicant keep its books and records in Illinois?

- ☐ Yes
☒ No (if No, permission pursuant to 83 Ill Adm. Code Part 250 needs to be requested.

The Applicant seeks permission as anticipated in 83 Ill. Admin. Code, Part 250 to maintain its books and records outside the State of Illinois. Applicant maintains its books and records at its headquarters in Palm Beach, Florida. In case it should be necessary for the Illinois Commerce Commission to have access those books and records, the Applicant will facilitate that access at its own expense.

MANAGERIAL

- 14. Please attach evidence of the applicant's managerial and technical resources and ability to provide service. This may be in either narrative form, resumes of key personnel, or a combination of these forms.**

Please see Exhibit III for resumes of key Company personnel.

- 15. List officers of Applicant.**

The following individuals are officers of WTI Communications, Inc.

Everardo (Tony) Rodriguez – CEO

Rhett Culver – Vice President

- 16. Does any officer of Applicant have an ownership or other interest in any other entity that has provided or is currently providing telecommunications services?**

- ☐ Yes (is Yes, list entity.)
☒ No

- 17. How will Applicant bill for its service(s)? (At a minimum, describe how often the Applicant will bill for service and details of the billing statement.)**

Applicant will bill Customers directly on a monthly basis. All billing statements will list the Applicant's name, address and customer service toll free telephone number for customer inquiries or concerns.

- 18. How does Applicant propose to handle service, billing, and repair complaints? (At a minimum, describe Applicant's internal process for complaint resolution, the complaint escalation process, the timeframe and process by which the Customer is notified by Applicant that they may seek assistance from the Commission?)**

Applicant will be responsible for all customer inquiries and complaints. The telephone number for customer inquiries and complaints will be provided by Applicant on the customer bill.

19. Will personnel be available at Applicant's business office during regular working hours to respond to inquiries about service or billing?

- ☒ Yes
☐ No

20. What telephone number(s) would a Customer use to contact your Company?

888-425-8880

21. Will Applicant abide by all Federal and State slamming and cramming laws pursuant to Section 13-902 of the Public Utilities Act and Section 258 of the 1996 Telecommunications Act?

- ☒ Yes
☐ No

22. Please describe applicant's procedures to prevent slamming and cramming of Customers?

Applicant provides all services via written contract and only provides services to business customers. Applicant will comply with the presubscribed carrier change rules as defined by the FCC. The company fully intends to comply with slamming and cramming rules as a local exchange provider and interexchange reseller.

The Applicant will utilize written LOAs and/or third party verification by an independent entity to ensure all orders are verified. Furthermore, the Applicant will handle its own billing and will not bill for services other than those designated by the customer.

23. If granted authority to operate as a local exchange carrier, will the applicant abide by the following 83 Illinois Administrative Code Parts: 705, 710, 720, 725, 730, 732, 735, 755, 756, 757, 770, and 772?

- ☒ Yes (Except Part 710 for which Company is seeking a waiver.)
☐ No (If No, please provide an explanation)

24. Is Applicant aware that it must file tariffs prior to providing service in Illinois?

- ☒ Yes
☐ No

FINANCIAL

Please attach evidence of Applicant's financial fitness through the submission of its most current income statement and balance sheet, or other appropriate documentation of applicant's financial resources and ability to provide service.

The Applicant's financial fitness is demonstrated by its balance sheet, which is provided in Exhibit IV.

TECHNICAL

26. Does Applicant utilize its own equipment and/or facilities?

- ☐ Yes (if Yes, please list the facilities Applicant intends to utilize. Also include evidence that Applicant possesses the necessary technical resources to deploy and maintain said facilities)
- ☒ No (If No, which facility provider(s) services does the Applicant intend to use:

See also response to Item 27.

27. Please describe the nature of service to be provided (e.g., operator services, internet, debit cards, long distance service, data services, local service, prepaid local service).

The Company proposes to offer competitive local exchange service, including exchange access service, and long distance services within the state. The Company will provide competitive local exchange services on a resale basis from the underlying ILEC. Switched direct dialed long distance services will be provided by reselling the services of underlying interexchange carriers.

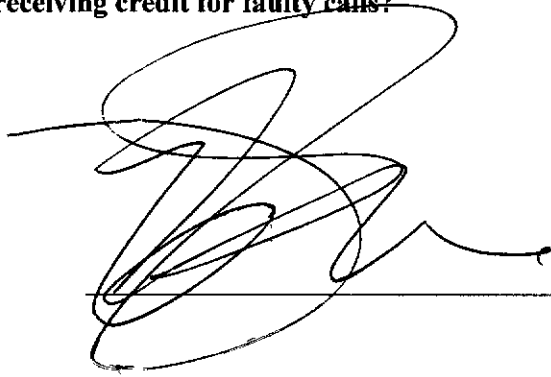
28. Will technical personnel be available at all times to assist Customers with service problems?

- ☒ Yes
- ☐ No

29. If Applicant intends to provide payphone service, will the equipment utilized comply with FCC requirements and Finding (9) of the Commission Order entered in Docket No. 84-0442 on June 11, 1986, including, but not limited to:

- (a) touch dialing;
- (b) access to 9-1-1 and "0" operator dialing without use of a coin;
- (c) rules governing use of payphones by disabled persons;
- (d) ability to complete local and long-distance calls;
- (e) unlimited duration for local calls; and
- (f) a message explaining the telephone's general operations, dialing instructions for emergency assistance, payphone owner's name, method of reporting service problems and method of receiving credit for faulty calls?

- ☐ Yes
- ☐ No
- ☒ Not Applicable.

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11.13.2008

Date:

VERIFICATION

This application shall be verified under oath.

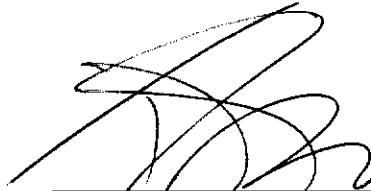
OATH

STATE OF CALIFORNIA

§
§
§

COUNTY OF Orange

Tony Rodriguez, makes oath and says that he is the Chief Executive Officer of WTI Communications, Inc.; that he has examined the foregoing application and that to the best of his knowledge, information, and belief, all statements of fact contained in the said application are true, and the said application is a correct statement of the business and affairs of the above-named applicant in respect to each and every matter set forth therein.

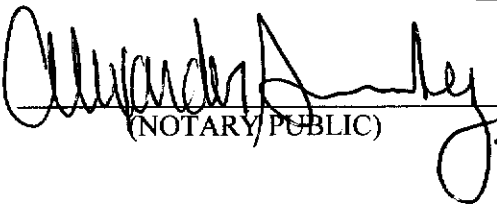


Tony Rodriguez, CEO
WTI Communications, Inc.

11.13.2008

Date:

Subscribed and sworn before me this 13TH day of November 2008.


(NOTARY PUBLIC)

My Commission expires on: May 05, 2010

